

Message

From: Osterweil, Elyse [Osterweil.Elyse@epa.gov]
Sent: 4/26/2021 11:31:09 AM
To: Gallagher, Sarah [Gallagher.Sarah@epa.gov]; Irwin, William [Irwin.William@epa.gov]; Phillips, Martin B. [phillips.martinb@epa.gov]
CC: Grifo, Francesca [Grifo.Francesca@epa.gov]; Hawkins, Belinda [Hawkins.Belinda@epa.gov]; Siciliano, CarolAnn [Siciliano.CarolAnn@epa.gov]
Subject: FW: [awareness]--Forestomach tumors
Attachments: Thompson et al 2018.pdf; Proctor et al.pdf; IRIS EGBE assessment_forestomach MOA.pdf; EGBEFINALPOSITIONPAPER2.pdf

I found an example of how Iris is extremely supportive of having scientific discussions when it is to reduce hazards, but not uphold them to make a proper safety finding. She rarely forwards papers and Agency guidance/policies. I think it is very noteworthy that the only times I really get references to guidances from Iris is to reduce hazards.

She even contradicts herself below and shows her own preference for papers published by industry, as I highlighted below. She made a big to-do about how wonderful it was of James to find this "mistake" and verbally praised him several times that we need to be more careful about how we make our hazard calls. I don't know which L-case this was and I was not at that pre-Scoping meeting.

Gino is also of the same mindset. He gets really excited when we find a paper that discounts the validity of QSAR data and will talk about it repeatedly. However, if we try to show him a paper that supports a hazard, he is largely silent or finds a way to discount it. He is also on a recent kick on a liver guidance, and making a big to-do about it and how obvious it is that we should be following this guidance. However, any guidance that supports upholding a hazard is dismissed as not relevant to TSCA because we don't have data requirements or tries to make the argument that the guidance is intended for FIFRA only.

I personally find Iris's email below a really good example of her giving lots of praise and recognition to assessors to delete hazards, and "training" us that we should only take great care in reading scientific literature, only when it supports removing a hazard as not relevant to humans. It is very important to note that this is quite different than the response I have every received for upholding a hazard. I do not recall ever getting this much praise for reading the scientific literature to making a safety finding, and in fact it's quite to opposite response where we are accused digging too deep into the data or that we don't have time to do these literature searches and read these papers, and coerced and bullying into removing hazards. And if we don't do it, she just has James or Liz, or another Part B assessor remove it later on when the Part A toxicologists are not in the room.

Thanks,
Elyse

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From: Camacho, Iris <Camacho.Iris@epa.gov>
Sent: Thursday, October 8, 2020 12:54 PM
To: Childs, Elizabeth <childs.elizabeth@epa.gov>; Choi, Kyoungju <Choi.Kyoungju@epa.gov>; Cox, James W. <cox.jamesw@epa.gov>; Mottl, Nathan <Mottl.Nathan@epa.gov>; Osterweil, Elyse <Osterweil.Elyse@epa.gov>; Salazar, Keith <Salazar.Keith@epa.gov>; Surapureddi, Sailesh <surapureddi.sailesh@epa.gov>

Cc: Gallagher, Jeffrey <Gallagher.Jeffrey@epa.gov>; Scarano, Louis <Scarano.Louis@epa.gov>

Subject: [awareness]--Forestomach tumors

Hi guys,

Learning is important to improve the quality of our science. I want to get us in the habit of reading the scientific literature including EPA's history of dealing with assessments and discussing these science issues within the NC team. This will help us improve our judgement calls about the quality of studies and how we integrate evidence to make scientific arguments.

The forestomach tumor came up today at pre-scoping for one of James' L cases. I would like to have a discussion with you about how to treat forestomach tumors in the HH risk assessments.

I have attached the EPA's IRIS EGBE assessment and a position paper that was about forestomach tumors. I have also attached two papers from industry scientists. There may be additional papers that I could not find, particularly from academia.

We need to read papers from different sources, not those that fit our beliefs, assumptions, biases. Science is about **FACTS** and how you use the available information along with the uncertainties to build scientific positions/arguments, and in our case, make recommendations to support regulatory decision-making.

Gino: let's talk what would be the best mechanism to have these discussions to foster learning and collaboration, and how we can start improving our framework of how we technically build these HH risk assessments.

Request: can one of you place these papers on the Resource folders on the CBI LAN, or Confluence. We got to better manage our information. Please send me a note when the files have been uploaded to Confluence or CBI shared folder. Thanks.

Have a great weekend!

Iris A. Camacho, Ph.D.

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